

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SALEM HARBOR POWER
DEVELOPMENT LP (f/k/a Footprint Power
Salem Harbor Development LP), *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10239 (MFW)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR
HEARING ON SEPTEMBER 20, 2022 AT 10:30 A.M. (ET)**

ZOOM INSTRUCTIONS:

The remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. COURTCALL WILL NOT BE USED FOR THIS HEARING.

Please use the following link to register for this hearing:

<https://debuscourts.zoomgov.com/meeting/register/vJItcO6vqDwqHGy8NokJ9gjKiLqSSWoPY80>

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

RESOLVED MATTER

1. Debtors' Motion for Entry of Orders (A) Dismissing Chapter 11 Cases of Highstar Salem Harbor Holdings GP, LLC (f/k/a Highstar Footprint Holdings GP, LLC), Highstar Salem Harbor Power Holdings L.P. (f/k/a Highstar Footprint Power Holdings L.P.), and Salem Harbor Power FinCo GP, LLC (f/k/a Footprint Power Salem Harbor FinCo GP, LLC), (B) Modifying the Caption of the Remaining Debtors' Chapter 11 Cases, and (C) Granting Related Relief [[D.I. 445](#); 8/30/22]

Related Pleadings:

- a) Certification of Counsel [[D.I. 456](#); 9/14/22]

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Salem Harbor Power Development LP (f/k/a Footprint Power Salem Harbor Development LP) (1360); Highstar Salem Harbor Holdings GP, LLC (f/k/a Highstar Footprint Holdings GP, LLC) (2253); Highstar Salem Harbor Power Holdings L.P. (f/k/a Highstar Footprint Power Holdings L.P.) (9509); Salem Harbor Power FinCo GP, LLC (f/k/a Footprint Power Salem Harbor FinCo GP, LLC) (N/A); Salem Harbor Power FinCo, LP (f/k/a Footprint Power Salem Harbor FinCo, LP) (9219); and SH Power DevCo GP LLC (f/k/a Footprint Power SH DevCo GP LLC) (9008). The location of the Debtors' service address is: c/o Tateswood Energy Company, LLC, 480 Wildwood Forest Drive, Suite 475, Spring, Texas 77380.

- b) Initial Order (A) Dismissing Chapter 11 Cases of Highstar Salem Harbor Holdings GP, LLC (f/k/a Highstar Footprint Holdings GP, LLC), Highstar Salem Harbor Power Holdings L.P. (f/k/a Highstar Footprint Power Holdings L.P.), and Salem Harbor Power FinCo GP, LLC (f/k/a Footprint Power Salem Harbor FinCo GP, LLC), (B) Modifying the Caption of the Remaining Debtors' Chapter 11 Cases, and (C) Granting Related Relief [[D.I. 457](#); 9/15/22]

Objection Deadline: September 13, 2022 at 4:00 p.m. (ET) [Extended for Iberdrola Energy Projects, Inc. to September 14, 2022 at 12:00 p.m. (ET)]

Objections/Informal Responses:

- c) Informal Response from the Office of the United States Trustee
- d) Informal Response from Iberdrola Energy Projects, Inc.

Status: An order has been entered. No hearing is necessary.

UNCONTESTED MATTER WITH CERTIFICATION OF COUNSEL

- 2. First Interim Fee Applications of the Debtors' Professionals for the Period from March 23, 2022 Through and Including June 30, 2022 [[D.I. 397](#); 8/15/22]

Related Pleadings: See Exhibit 1, attached hereto, for additional related pleadings with respect to the interim fee applications.

- a) Certification of Counsel [[D.I. 448](#); 9/7/22]

Objection Deadline: September 6, 2022 at 4:00 p.m. (ET)

Objections/Informal Responses: None.

Status: A proposed form of order has been submitted under certification of counsel. A hearing is only necessary to the extent that the Court has questions or concerns.

Dated: September 16, 2022
Wilmington, Delaware

Respectfully submitted,

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- and -

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*Counsel to the Debtors and
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EXHIBIT 1 – INDEX TO FIRST INTERIM FEE APPLICATIONS

A. Paul, Weiss, Rifkind, Wharton & Garrison LLP

1. First Monthly Application for the Period from March 23, 2022 through April 30, 2022 [[D.I. 171](#); 5/16/22]
2. Certificate of No Objection [[D.I. 232](#); 6/7/22]
3. Second Monthly Application for the Period from May 1, 2022 through May 31, 2022 [[D.I. 252](#); 6/21/22]
4. Certificate of No Objection [[D.I. 308](#); 7/13/22]
5. Third Monthly Application for the Period from June 1, 2022 through June 30, 2022 [[D.I. 326](#); 7/20/22]
6. Certificate of No Objection [[D.I. 368](#); 8/11/22]
7. First Interim Fee Application [[D.I. 397](#); 8/15/22]
8. Supplement to First Interim Fee Application [[D.I. 398](#); 8/15/22]

B. Young Conaway Stargatt & Taylor, LLP

1. First Monthly Application for the Period from March 23, 2022 through April 30, 2022 [[D.I. 172](#); 5/16/22]
2. Certificate of No Objection [[D.I. 233](#); 6/7/22]
3. Second Monthly Application for the Period from May 1, 2022 through May 31, 2022 [[D.I. 253](#); 6/21/22]
4. Certificate of No Objection [[D.I. 309](#); 7/13/22]
5. Third Monthly Application for the Period from June 1, 2022 through June 30, 2022 [[D.I. 327](#); 7/20/22]
6. Certificate of No Objection [[D.I. 369](#); 8/11/22]
7. First Interim Fee Application [[D.I. 397](#); 8/15/22]
8. Supplement to First Interim Fee Application [[D.I. 399](#); 8/15/22]

C. Houlihan Lokey Capital, Inc.

1. First Monthly Application for the Period from March 23, 2022 through April 30, 2022 [[D.I. 173](#); 5/16/22]
2. Certificate of No Objection [[D.I. 234](#); 6/7/22]
3. Second Monthly Application for the Period from May 1, 2022 through May 31, 2022 [[D.I. 254](#); 6/21/22]
4. Certificate of No Objection [[D.I. 310](#); 7/13/22]
5. Third Monthly Application for the Period from June 1, 2022 through June 30, 2022 [[D.I. 328](#); 7/20/22]
6. Supplemental Declaration of Matthew A. Mazzucchi in Support of Third Monthly Application for the Period from June 1, 2022 through June 30, 2022 [[D.I. 364](#); 8/10/22]
7. Certificate of No Objection [[D.I. 370](#); 8/11/22]
8. First Interim Fee Application [[D.I. 397](#); 8/15/22]

D. Morgan, Lewis & Bockius, LLP

1. First Monthly Application for the Period from March 23, 2022 through April 30, 2022 [[D.I. 174](#); 5/16/22]
2. Certificate of No Objection [[D.I. 235](#); 6/7/22]
3. Second Monthly Application for the Period from May 1, 2022 through May 31, 2022 [[D.I. 255](#); 6/21/22]
4. Certificate of No Objection [[D.I. 311](#); 7/13/22]
5. Third Monthly Application for the Period from June 1, 2022 through June 30, 2022 [[D.I. 329](#); 7/20/22]
6. Certificate of No Objection [[D.I. 425](#); 8/19/22]
7. First Interim Fee Application [[D.I. 397](#); 8/15/22]
8. Supplement to First Interim Fee Application [[D.I. 426](#); 8/19/22]

E. Kroll Restructuring Administration LLC (f/k/a Prime Clerk LLC)

1. First Monthly Application for the Period from March 23, 2022 through April 30, 2022 [[D.I. 182](#); 5/19/22]
2. Certificate of No Objection [[D.I. 244](#); 6/14/22]
3. Second Monthly Application for the Period from May 1, 2022 through May 31, 2022 [[D.I. 247](#); 6/17/22]
4. Certificate of No Objection [[D.I. 301](#); 7/11/22]
5. Third Monthly Application for the Period from June 1, 2022 through June 30, 2022 [[D.I. 331](#); 7/21/22]
6. Certificate of No Objection [[D.I. 387](#); 8/12/22]
7. First Interim Fee Application [[D.I. 397](#); 8/15/22]